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JAP:JSR

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -
PAUL RAYMOND LABRADOR,

Defendant.

- - - - - X

EASTERN DISTRICT OF NEW YORK, SS:

GLENN BUCHAN, being duly sworn, deposes and states that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about May 21, 2012, within the Eastern District of New York and elsewhere, defendant PAUL RAYMOND LABRADOR did knowingly, intentionally, and unlawfully attempt to import into the United States from a place outside thereof cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 963).

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On May 21, 2012, defendant PAUL RAYMOND LABRADOR arrived at John F. Kennedy International Airport in Queens, New York ("JFK"), aboard JetBlue Flight No. 810 from Santo Domingo, Dominican Republic.

2. The defendant PAUL RAYMOND LABRADOR was selected for an enforcement examination by a Customs and Border Protection Officer ("CBP"). During the examination defendant PAUL RAYMOND LABRADOR appeared unusually nervous and he avoided eye contact. An initial search of the defendant's carry-on bag yielded negative results.

3. A CBP Officer conducted a pat-down of the defendant PAUL RAYMOND LABRADOR, which meet with negative results.

4. Defendant PAUL RAYMOND LABRADOR was presented with an x-ray consent form, which he read, appeared to understand and signed.

5. Defendant PAUL RAYMOND LABRADOR then admitted to ingesting seventy-five (75) pellets of cocaine.

6. Defendant PAUL RAYMOND LABRADOR was transported to the JFK medical facility where an x-ray was taken of the defendant's intestinal tract, which was positive for foreign bodies.


7. The defendant's carry-on bag was searched again and seven (7) pellets were found inside of the bag. The

defendant admitted that he placed the seven (7) pellets inside his carry-on. The seven (7) pellets have field tested negative for cocaine and other narcotics.

8. Thus far the defendant PAUL RAYMOND LABRADOR has passed eleven (11) pellets. The pellets field-tested negative for cocaine and other narcotics.

9. Defendant PAUL RAYMOND LABRADOR will be detained at the JFK medical facility until such time as he has passed the pellets contained within his intestinal tract.

WHEREFORE, your deponent respectfully requests that defendant PAUL RAYMOND LABRADOR be dealt with according to law.


GLENN BUCHAN
Special Agent
Homeland Security Investigations

Sworn to me before this
~~22nd day~~ of May 2012

HONORABLE ROBERT M. LEVY
EASTERN DISTRICT OF NEW YORK